

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE

In re

Fred Fuller Oil & Propane Co., Inc.
Debtor

Chapter 7
Case No. 14-12188-MAF

JOINT MOTION TO EXTEND DEADLINE TO FILE JOINT REPORT

To the Honorable Michael A. Fagone, United States Bankruptcy Judge:

Pursuant to Local Bankruptcy Rule 5071-1, William K. Harrington, United States Trustee (“United States Trustee”), and Brinkman Portillo Ronk APC, together request that the deadline for submitting the Joint Report in advance of the scheduled evidentiary hearing on the United States Trustee’s Objection to the First & Final Fee Application of Brinkman Portillo Ronk APC be extended by one day, or until April 16, 2019. A proposed Order is submitted herewith.

As grounds for this motion, the parties respectfully submit as follows:

1. Before the Court on April 22, 2019 is an evidentiary hearing on the First and Final Fee Application of Brinkman Portillo Ronk APC, as counsel to the Official Creditors’ Committee, and the United States Trustee’s Objection thereto.
2. According to the Court’s scheduling Order of January 29, 2019, the parties are to submit by April 15, 2019 their Joint Report outlining the legal and factual issues to be determined at the evidentiary hearing. *See* Court Docket No. 1110.
3. A draft Joint Report is under review.
4. The parties have commenced a dialogue in an effort to resolve the issues but more time to complete the Joint Report is required. The parties anticipate filing their Joint Report by April 16, 2019.

WHEREFORE, the parties respectfully request that the Court:

- a. Extend the deadline for submitting the Final Report to April 16, 2019; and
- b. Grant such other and further relief as is just.

Respectfully submitted,

WILLIAM K. HARRINGTON
UNITED STATES TRUSTEE

By: /s/ Geraldine Karonis
Geraldine Karonis
Assistant U.S. Trustee
53 Pleasant Street
Suite 2300
Concord, NH 03301
(603) 226-4243
Bnh 01853

Dated: April 15, 2019

CERTIFICATE OF SERVICE

I hereby certify that on this date I served a copy of the foregoing Motion and proposed Order upon the following parties via CM/ECF:

14-12188-MAF Notice will be electronically mailed to:

John L. Allen
Joseph H. Baldiga
Charles R. Bennett, Jr.
Jake C. Blanchard
Daren R. Brinkman
Christopher M. Candon
Daniel C. Cohn
Eleanor Wm Dahar
Leonard G. Deming, II
Cheryl C. Deshaies
Christopher M. Dube
Steven J. Dutton
Jeremy R. Fischer
Edmond J. Ford
William S. Gannon
John Garrigan
Olga L. Gordon
Courtney H.G. Herz
D. Ethan Jeffrey

Leslie H. Johnson
James S. LaMontagne
Daniel P. Luker
Ryan MacDonald
Benjamin E. Marcus
Michael T. McCormack
Richard K. McPartlin
Harold B. Murphy
Harold B. Murphy
Diana Delaney O'Hara
Michael K. O'Neil
Edward D. Philpot, Jr.
Jesse I. Redlener
Peter C.L. Roth
Timothy P. Smith
Frank P. Spinella, Jr.
Peter N. Tamposi
Gregory T. Uliasz

/s/ Geraldine Karonis
Geraldine Karonis

Dated: April 15, 2019